FILED: ROCKLAND COUNTY CLERK 04/03/2019 03:23 PM

NYSCEF DOC. NO. 7

INDEX NO. 031783/2019

RECEIVED NYSCEF: 04/03/2019

AFFIDAVIT OF J. AND E. E.

STATE OF NEW YORK)
) ss:s
COUNTY OF ROCKLAND)

- J. AND E. E., having been duly sworn, hereby state and depose under pains and penalties of perjury:
- 1. We are the parents of two children who have attended the Green Meadow Waldorf School before their exclusion. Our older daughter has attended GMWS for 5 years and our younger daughter for 3 years. Our 8-year-old, AE, was attending the second grade in the lower school. Our 5-year-old daughter, SE, was attending a full day kindergarten before the exclusion.
- 2. Both of our daughters have not been vaccinated since birth. We carry strong spiritual beliefs that the body is more than physical matter to be manipulated and that illness is a mode of transformation for the body if it naturally responds to illness. We will not adhere to vaccination by coercion and, therefore, the exclusion order has forced us to find alternative means of educating our children off-campus. We are unclear as to how our children would have been endangered attending a school with no reported cases of measles.
- 3. These last few months of exclusion have been a trial for us, as parents. We struggle with the reality that we must now contribute more time to our children's education whilst we maintain our other commitments. Erin is finishing the final term of a professional training. She is now teaching her

1

ROCKLAND COUNTY CLERK 04/03/2019 03:23 PM

INDEX NO. 031783/2019

RECEIVED NYSCEF: 04/03/2019

daughter during her lunch breaks and misses two afternoons of course study. Jan teaches and looks after his daughters. On occasion, he has had to work later than usual to compensate for time spent caring for the children. There is a lot of time and effort taken to prepare a lesson that is true to the Walderf curriculum. We have lengthy meetings with other parents and teachers on a weekly basis to support our educational endeavors.

- 4. The exclusion order has taken its toll on our children as well. We are disappointed that our youngest daughter has such an irregular schedule when we had planned for her to be in a full day program with a regular rhythm. She also misses the company of children her own age. Even though we reside in the community where two of the GMWS kindergartens are based, she must not join their activities. Our older daughter has taken on the psychological disturbances that social exclusion can engender. She has openly stated that her teacher "hates her" and that the other classmates are now "strangers," because she has been separated from them.
- 5. We chose GMWS because our spiritual beliefs are nurtured there. Now, the defendant is infringing upon our individual freedom both to exercise the religious exemption we sought and received from the school [attached] and our choice of private schooling for our children. Regardless of the view of those running our school, it has been forced to trammel our religious exemption and overrule our school choice.

2

FILED: ROCKLAND COUNTY CLERK 04/03/2019 03:23 PM

NYSCEF DOC. NO. 7

INDEX NO. 031783/2019

RECEIVED NYSCEF: 04/03/2019

6. We respectfully request that the Court overturn the exclusion order and allow our children to resume their educations.

 J.E.	E. E.
J.E.	E.E.

Signed and sworn to before me this ____ day of March 2019.

NOTARY PUBLIC

LATER BANK

My commission expires:

MICHAEL HOWARD SUSSMAN Notary Public, State of New York No. 02SU6332584 Qualified in Orange County (4 Commission Expires Nov. 09, 20 MICHAEL HOWARD SUSSMAN Notary Public, State of New York No. 02SU6332584 Qualified in Orange County Commission Expires Nov. 09, 20